

**COMMONWEALTH OF MASSACHUSETTS**  
**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department on its own motion into the appropriate regulatory plan to succeed price cap regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts' retail intrastate telecommunications services in the Commonwealth of Massachusetts

DTE 01-31  
(PHASE II)

**AT&T'S FIRST SET OF INFORMATION  
REQUESTS TO VERIZON IN PHASE II**

AT&T Communications of New England, Inc. hereby submits to Verizon Massachusetts the following information requests. Please provide responses to these requests as they are completed.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

## INFORMATION REQUESTS

Refer to Verizon services listed in Tab C of Verizon's June 5, 2002 compliance filing.

1. Please identify and list each service that can be provided to end user customers on DS1 or above circuits.
2. Please identify and list each service that is currently being provided to at least one end user customer on DS1 or above circuits.
3. Please identify and list each service that during the last ten years has been provided to at least one end user customer on DS1 or above circuits.
4. Please identify and list each service that Verizon makes available under the terms of its tariff to end user customers served on DS1 or above circuits. (Please include any service that Verizon does not expressly exclude from offerings available to customers served on DS1 or above circuits.)
5. Please identify and list each service that Verizon makes available under the terms of its tariff only to end user customers served on voice grade, DS0 level circuits.
6. Please identify and list each service that cannot as a technical matter be provided to end user customers served on DS1 or above level circuits.
7. Please identify and list each service that is currently provided only to end user customers served on voice grade, DS0 level circuits, *i.e.*, services for which no end user currently purchasing the service is served by a DS1 or above level circuit.

Respectfully submitted,

AT&T COMMUNICATIONS OF  
NEW ENGLAND, INC.

By its attorneys,

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